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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
 ORACLE AMERICA, INC., a Delaware
 corporation; and ORACLE
 INTERNATIONAL CORPORATION, a
 California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada
 corporation; SETH RAVIN, an individual,

Defendant.

Case No 2:10-cv-00106-LRH-PAL

**ORACLE'S MOTION FOR LEAVE TO
 FILE UNDER SEAL PORTIONS OF THE
 JOINT REQUEST FOR CASE
 MANAGEMENT CONFERENCE AND
 EXHIBITS A-F**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), Local Rule 10-5(b) and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court grant leave to file under seal portions of the parties’ Joint Request For Case Management Conference and Exhibits A-F to the Declaration of Nitin Jindal in Support of Joint Request For Case Management Conference. A public, redacted version of the Joint Request was filed on September 17, 2014, *see* Dkt. 488, and an unredacted version of the Joint Request was filed under seal with the Court on September 17, 2014. *See* Dkt. 490. Exhibits A-F were redacted from the Jindal Declaration, Dkt. 489, and unredacted versions were filed under seal with the Court on September 17, 2014, Dkts. 491-496.

Sealing Exhibits A-F and portions of the Joint Request is requested because the documents contain information that Rimini or Oracle has designated as “Highly Confidential Information – Attorneys’ Eyes Only” or “Confidential Information” under the terms of the Protective Order. The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order **only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c).** The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

Oracle or Rimini has identified portions of the Joint Request and Exhibits A-F as containing portions that are Confidential and Highly Confidential, and Oracle represents that good cause exists for sealing those portions of the documents. This is a sufficient showing of good cause to permit a sealing order on a non-dispositive motion. *See, e.g., Pacific Gas and Elec. Co. v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

For the foregoing reasons, Oracle respectfully requests that the Court find that good cause exists to file under seal Jindal Exhibits A-F and portions of the Joint Request.

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By: /s/ Geoffrey M. Howard
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